

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 16-cv-02686-JSR
DATE FILED: 7/27/18

In re: PETROBRAS SECURITIES LITIGATION

This Document Applies To:

ALL CASES

14-cv-9662 (JSR)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on April 20, 2018, Class Plaintiffs¹ filed a Motion for Final Approval of Settlement and Plan of Allocation (“Final Approval Motion”);

WHEREAS, on April 20, 2018, Class Counsel filed a Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (“Attorneys’ Fees Motion”);

WHEREAS, on May 18, 2018, Mathis and Catherine Bishop filed an Objection to Proposed Settlement and Fee Application, limited to an objection to the requested award of attorneys’ fees;

WHEREAS, on June 25, 2018, this Court entered an Opinion and Order granting the Final Approval Motion, and granting in part the Attorneys’ Fees Motion and instructing the Clerk to enter Final Judgment and to close the case, which the Clerk did on June 27, 2018;

WHEREAS, on July 2, 2018, this Court entered a Final Judgment incorporating by reference all aspects of the June 25, 2018 Order;

WHEREAS, on July 16, 2018, Mathis and Catherine Bishop filed a Notice of Appeal from the June 27, 2018 Final Judgment limited to the award of attorneys’ fees;

¹ Unless otherwise noted, all capitalized terms have the meanings assigned to them in the Stipulation of Settlement and Release, ECF No. 767-1.

WHEREAS, under the Stipulation of Settlement and Release and the Amended Stipulation and Agreement of Settlement between PwC Brazil and plaintiffs dated February 1, 2018, ECF 767-10, an appeal “pertaining solely to . . . any order issued with respect to any application for attorneys’ fees and expenses . . . shall not in any way delay or preclude the Judgment from becoming Final” for purposes of, inter alia, distribution to Settlement Class Members;

WHEREAS, Mathis and Catherine Bishop are taking an appeal limited to the application for attorneys’ fees and expenses, and they and the parties desire to avoid any ambiguity and unnecessary delay and to permit this Court and the Claims Administrator to distribute the Settlement Fund to the Settlement Class Members;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties and Mathis and Catherine Bishop, either pro se or through their undersigned counsel, subject to approval by the Court, as follows:

1. Mathis and Catherine Bishop affirm that their appeal pertains solely to the issue of attorneys’ fees and expenses.
2. The pendency of this appeal does not preclude the Settlement from becoming Final.
3. This Stipulation may be signed in counterparts.

Date: July 20, 2018
New York, NY

Stipulated and agreed to by:

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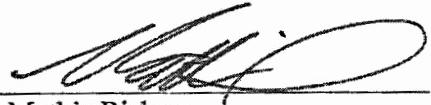
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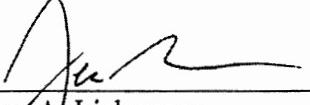
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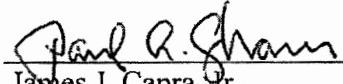
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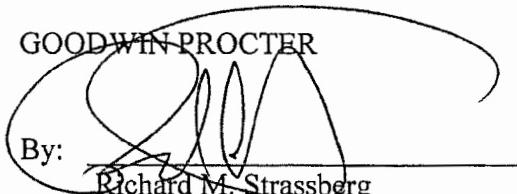
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SO ORDERED.

Dated: _____

Honorable Jed S. Rakoff
United States District Judge

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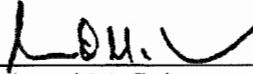
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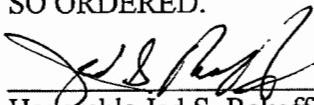
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SO ORDERED.


Honorable Jed S. Rakoff
United States District Judge

Dated: 7/26/18